

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Halpert Enterprises Plaintiff,

- against -

ABN Amro Holdings Defendant.
 N.V., et al.

07 cv 5454

(PKC)
 (HRC)
 (R)

MOTION TO ADMIT COUNSEL
PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Harry H. Wise, III a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Mark A. Golovach
 Firm Name: Robbins Umeda & Fink, LLP
 Address: 610 West Ash Street, Suite 1800
 City/State/Zip: San Diego, CA 92101
 Phone Number: (619) 525-3990
 Fax Number: (619) 525-3991

Mark A. Golovach is a member in good standing of the Bar of the States of California

There are no pending disciplinary proceeding against Mark A. Golovach in any State or Federal court.

Dated: October 10, 2007
 City, State: NEW YORK, N.Y.

Respectfully submitted,

Harry H. Wise, III
 Sponsor's HARRY H. WISE, III
 SDNY Bar (H26841)

Firm Name: LAW OFFICES OF HARRY H. WISE, III
 Address: 500 Fifth Avenue
 City/State/Zip: NEW YORK NY 10110
 Phone Number: (212) 810-2430
 Fax Number: (212) 810-2430

FILED
 2007 OCT 10 PM 1:55
 S.D. OF N.Y.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HALPERT ENTERPRISES, On Behalf of
Itself and All Others Similarly Situated,

Plaintiff,

v.

ABN AMRO HOLDING N.V., RIJKMAN
GROENINK, WILCO JISKOOT, JOOST
KUIPER, HUGH SCOTT-BARRETT,
HUIBERT BOUMEESTER, PIERO
OVERMARS, RON TEERLINK, ARTUR
MARTINEZ, ANDRE OLIJSLAGER,
LOUISE GROENMAN, DAVID BARON DE
ROTHSCHILD, TRUDE MAAS-DE
BROUWER, MARCUS PRATINI DE
MORAES, PAOLO SCARONI, LORD
SHARMAN OF REDLYNCH, ROB VAN
DEN BERGH, ANTHONY RUYS, GERT-
JAN KRAMER, GERHARD RANDA AND
BANK OF AMERICA CORP.,

Defendants.

Civ. Action No. 07-CV-5454

(PKC)

AFFIDAVIT OF HARRY WISE IN
SUPPORT OF MOTION TO ADMIT
COUNSEL PRO HAC VICE

State of New York)
) ss:
County of New York)

Harry H. Wise, III, being duly sworn, hereby deposes and says:

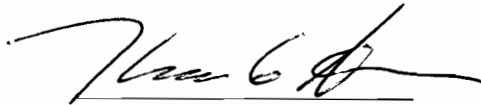
1. I am counsel to the Law Offices of Thomas G. Amon, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Mark A. Golovach as counsel *pro hac vice* to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1976. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. Mr. Golovach is an associate with the law firm of Robbins Umeda & Fink, LLP

4. I have found Mr. Golovach to be a skilled attorney who is experienced n Federal practice and is familiar with the Federal Rules of Procedure, and of high moral character.
 5. Accordingly, I am pleased to move the admission of Mark A. Golovach, *pro hac vice*.
 6. I respectfully submit a proposed order granting the admission of Mark A. Golovach, *pro hac vice*, which is attached hereto as Exhibit A. His certificate of good standing is Exhibit B.
- WHEREFORE it is respectfully requested that the motion to admit Mark A. Golovach, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.


HARRY H. WISE, III

(HW6841)

Sworn to before me
This 10 day of September, 2007



Thomas G. Amon
Notary Public, State of New York
No. 02AM6059182
Qualified in New York County
Commission Expires May 21, 2008

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Halpert Enterprises Plaintiff,

7 cv 5454 (PKC)

- against -

ABN Amro Holdings N.V., et al. Defendant.

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Harry Wise attorney for Halpert Enterprises
and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Mark A. Golovach
Firm Name: Robbins Umeda & Fink, LLP
Address: 610 West Ash Street, Suite 1800
City/State/Zip: San Diego, CA 92101
Telephone/Fax: (619) 525-3990
Email Address: (619) 525-3991

is admitted to practice pro hac vice as counsel for Halpert Enterprises in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:
City, State:

United States District/Magistrate Judge



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

September 19, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, MARK ANDREW GOLOVACH, #220760 was admitted to the practice of law in this state by the Supreme Court of California on October 24, 2002; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

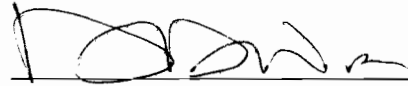
A handwritten signature in black ink, appearing to read "Kath Lambert".

Kath Lambert
Custodian of Membership Records

DECLARATION OF SERVICE

I, Harry H. Wise, III, counsel for plaintiff in this action, hereby declare that on the 10th day of October, 2007, I served the annexed Motion for Admission Pro Hac Vice upon Lawrence J. Portnoy, Esq., Davis Polk & Wardwell, counsel for defendants, at 450 Lexington Avenue, New York, N.Y. 10017, by mailing him a copy by First Class Mail.

Dated: October 10, 2007
New York, N.Y.

A handwritten signature in black ink, appearing to read "H. Wise", is written over a horizontal line.